
Appendix H: Recommended Protocol for Peer Review of Distance Education

Adopted January 2018

Introduction

The Commission [Policy on Distance Education and on Correspondence Education](#) (in compliance with federal regulation [34 CFR § 602.3](#)) specifies that all learning opportunities provided by accredited institutions must have equivalent quality, accountability, and focus on student outcomes, regardless of mode of delivery. Therefore, any institution offering courses and programs through distance education or correspondence education is expected to meet the requirements of accreditation in each of its courses and programs and at each of its sites, and any institution offering courses through distance education can expect that peer review teams will evaluate distance education courses and programs to ensure that the institution is providing equivalent quality, accountability, and focus on student outcomes.

For its part, in order to promote consistency in the ways in which peer review teams evaluate distance education at institutions, the ACCJC recognizes that institutions and peer review teams need a framework for evaluating such courses and programs. The purpose of this thought paper is to propose a framework for consistent peer review processes of distance education throughout the region.

Background

Through conversations both with institutions and with chairs of peer review teams, the ACCJC has become aware of different ways in which institutions make distance education courses available for team review and different levels of scrutiny practiced by peer review teams during comprehensive visits to colleges. The differences lead to inconsistencies in evaluation processes and in the results of those evaluations.

- Inconsistency in how institutions select courses to be observed: Some institutions purposefully select courses that reflect their best practices in distance education. Some institutions select only those courses that faculty have given permission for the team to observe. Some institutions select a random sampling of courses. Some institutions allow the peer review team complete discretion over which courses to select for observation.
- Inconsistency in the number of courses that teams observe: For example, one team visiting a small college observed ten online classes out of the 60 classes that the college offered online during the semester, or roughly 17% of the online classes. A second team visiting a larger college looked at 90 classes out of the 270 that were offered during the same semester. The latter team observed 33% of that institution's online classes.
- Inconsistency in the level of access that peer review teams receive: Some teams are granted the same level of access that a student would have. Some teams are granted a level of access similar to an instructor or teaching assistant. Those who receive student-level access may not be able to observe the different sorts of interactions that occur between the instructor and students. Such reviewers might see only whole-class interactions such as discussion forums. Since they are not real students, they would not participate in or be privy to any private interactions that may occur between the instructor

and individual students or between the instructor and small groups of students that the instructor has created for special projects or discussions. Peer reviewers who have such limited access may draw false conclusions about the extent of regular and substantive interactions.

- Inconsistency in the basis of evaluation: Some team members will evaluate an institution's evidence of regular and substantive interaction based on the institution's own definitions and expectations for best practices. On another team, the peer reviewer may evaluate the evidence based on his or her home institution's definitions and expectations for best practices. Differences between the technology used at the college being reviewed and the technology used at the peer reviewer's home institution might also influence the peer reviewer's evaluation.
- Inconsistency in the recommendations that teams write as a result of their observations and evaluations: The ACCJC has noted that some teams' evaluations are stricter than others. A peer review team that finds 50% of courses with regular and substantive interaction may write a Recommendation for Improvement, whereas a second team that finds 50% of courses without regular and substantive interaction may write a Compliance Recommendation.
- Inconsistency in the types of courses that teams review: Many teams observe only fully online distance education courses. Some teams also observe hybrid courses (courses that utilize face-to-face instruction in a traditional classroom plus asynchronous, online instruction). Some teams also observe classes that use two-way interactive video instruction.

Toward Consistent Evaluation Practices

The Accrediting Commission for Community and Junior Colleges desires to approach all college evaluations equitably and to assess all institutions' quality and integrity using the same criteria and expectations for each institutional review. The Eligibility Requirements, Standards of Accreditation, Commission policies, and the *Guide for Evaluating and Improving Institutions* provide the foundations for consistency of evaluation and Commission actions. Still, because there are variances in the ways that institutions implement distance education and the ways in which peer review teams observe and evaluate distance education, especially fully online courses, both colleges and evaluation teams need guidelines to evaluate the quality of distance education in consistent ways.

Consistency in the evaluation process is also important as a means to minimizing bias. When an institution or its faculty self-selects the courses that a team will review, their desire to appear successful may influence which courses they allow a peer review team to observe. When a peer reviewer uses his or her own institution as a model for distance education, then the limitations of his or her experience may impact the evaluation process.

When colleges get together and discuss the experience of their comprehensive accreditation visits, they become aware of such inconsistencies and as a result may develop distrust in the value of the peer review process. Colleges should be able to expect equitable treatment.

Lastly, it is important that both the college and peer review team ensure that distance education is truly distance education and not correspondence education because the difference impacts Title IV federal financial aid. It is the regular and substantive interaction between instructor and students that sets distance education apart from correspondence education. Guided by federal regulations, peer reviewers must pay close attention to evidence of regular and substantive

interaction. However, when peer review visits are conducted toward the beginning of a semester or quarter, regular interactions may not yet be in evidence.

Therefore, the ACCJC has devised the following guidelines to enhance the consistency of evaluating distance education.

Guidelines for Evaluating Distance Education

The guidelines below are suggested activities intended to promote consistency (1) in the way that institutions prepare for the peer review team, and (2) in the way that peer review teams observe distance education, especially online classes.

1. Guide for institutions:

- A. In its ISER, among its evidence of meeting either Standard II.A.1 or II.A.2, the college should include the following:
 - Its own policy, if it has one, on ensuring that content and methodology for teaching distance education are equivalent to those of face-to-face courses and programs.
 - Its own definitions and guidelines for best practices for “regular and substantive” interaction between instructor and students. These may be written in administrative procedures, standard operating procedures, a faculty handbook, curriculum handbook, or similar document as appropriate to the institution.
 - Evidence of faculty training on best practices for “regular and substantive” interaction in distance education.
 - A brief description of features within the college’s learning management system (LMS) that facilitate substantive interaction. Evidence might be presented in the form of data analysis of instructor use of these features.
 - Also, description and evidence of the college’s student verification methods.
- B. In preparation for the Comprehensive Peer Review Visit:
 - The college should inform distance education faculty that the peer review team will “observe” a randomly selected cadre of distance education classes.
 - The college should work with the Team Chair regarding the random selection of fully online distance education classes to observe. The college should select no fewer than 15 separate sections but no more than 10% of the total number of distance education sections offered in one semester. When possible, it is preferred that the peer reviewers have access to archived distance education classes from the semester immediately preceding the semester of the visit, affording them the opportunity to observe “regular and substantive” interaction through a full semester, quarter, or shortened term.

Another benefit of providing peer reviewers access to the prior term’s online classes is that the reviewers’ presence in the online class will not interfere with the instruction or the course design. Such interference has been a concern of online instructors, making them reluctant to allow access to visitors.
 - The college should inform the peer review team of instructions for access to the randomly selected classes.
 - The college should expect that the peer review team will maintain confidentiality of student and instructor information.

2. Guidelines for Peer Review Teams

- The team chair will appoint one or two team members to observe distance education classes.

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- The peer reviewers should observe no fewer than 15 separate fully online distance education sections but no more than 10% of the total number of online sections offered in a semester.
 - If the college provides access to archived online sections from the semester or quarter immediately preceding the visit, then the assigned team members will be able to conduct their observations of the courses as part of the desk review of the evidence prior to the actual visit. The reviewers will not need to spend time observing online classes during the visit. This is a preferred approach to online classroom observation.
 - Peer reviewers should be allowed access as an instructor or teaching assistant so that they will be able to observe all facets of instructor interactions with students. Considering the sensitive nature of such observations and acting in accordance with the Commission Policy on Public Disclosure and Confidentiality in the Accreditation Process, the peer reviewers will maintain confidentiality throughout the observations and report writing.
 - Peer reviewers should evaluate the courses using the institution's own definitions and expectations for regular and substantive interaction. This includes observations of hybrid sections and sections taught using interactive video.
 - Peer reviewers should triangulate their findings by confirming their observations through interviews with faculty and students who participate in distance education, and with managers or administrators who oversee distance education, and by using those interviews to uncover the root of deficiencies that they may have found in their observations.
 - In keeping with federal policy §602.17(g), peer reviewers should be able to ensure that effective student verification processes are being employed; that student privacy is protected; and that, if there are any additional charges for these service, the college has written policies that students will be notified of such charges at the time of registration or enrollment.

When it comes to a team's writing recommendations pertaining to distance education, the peer review team needs to consider several factors. A simple numerical rubric would be easy to use. For example, if a team finds that less than half of the online classes observed demonstrated evidence of regular and substantive interaction, the team may want to write a compliance recommendation. However, based on other factors, such as the institution's professional development plans for distance education instructors, the team may instead want to write a recommendation for improvement. In considering recommendations, the team will want to clearly identify the Standards in which the institution is deficient. The team will want to ensure that in the discussion of the findings for those standards, the deficiency in distance education is specifically called out.

For instance, if the team finds that only 35% of the online classes observed had evidence of regular and substantive interaction, the team might write those findings in its discussion of Standard II.A.2, describing how the college is deficient in ensuring that "the content and methods of instruction meet generally accepted academic and professional standards." Perhaps during interviews, the team finds that the college has not provided training to online instructors on best practices for online instruction nor perhaps on how to operate the learning management system. The team might include this discussion of distance education in its findings for Standard III.A.14, describing how the institution is deficient in providing professional development "consistent with the institutional mission and based on evolving pedagogy, technology, and learning needs."

In sum, crafting recommendations related to distance education, whether for compliance or for improvement, is not driven only by a low percentage of online classes with evidence of regular and substantive interaction. In its interviews with members of the college community, including faculty, students, and administrators, the team will want to explore the roots of the low percentage. If less than half of a college's online classes demonstrate regular and substantive interaction, chances are that the institution is experiencing challenges with one or more of the following: publishing or implementing policies and procedures related to distance education, ensuring professional development opportunities for online instructors, establishing accountability measures to monitor and ensure regular and substantive interaction, or embracing adjunct instructors in professional development and course development opportunities. The team will want to document the challenges carefully in its findings and then write recommendations appropriate to the severity of the deficiencies. Then, in the final Team Report, the team must ensure that its responses to the checklist questions pertaining to the Policy on Distance Education and on Correspondence Education are consistent with its findings and recommendations in the body of the report.